

201-14860

November 17, 2003

Mr. Mike Leavitt, Administrator
U.S. EPA
P.O. Box 1473
Merrifield, VA 22116

Attn: Chemical Right-to-Know Program

RE: HPV Chemical Challenge Program, AR-201

Dear Mr. Leavitt:

This letter was drafted is to inform you that the Eastman Chemical Company is planning to move our sponsorship for the below two chemicals into a category that was just recently developed to take advantage of structure activity relationships with other chemicals. The category is called "Alkyl Nitriles" and is being managed by a consortium through PCA Services (Durham, NC).

CAS No. 78-82-0	Isobutyronitrile
CAS No. 109-74-0	Butyronitrile

The HPV registration number for Eastman Chemical is If there are any questions regarding the management of this chemical please call Dr. James Deyo at 423-229-5208 (deyo@eastman.com).

Sincerely,

James A. Deyo D.V.M., Ph.D., D.A.B.T.
Senior Associate Applied Toxicology

CC: Dr. Rod Gerwe
PCA Services

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PCA Services, Inc.
2704 Trail Wood Drive
Durham, NC 27705

November 18, 2003

Administrator
US Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116
Attention: Chemical Right-to-Know Program

Dear Administrator:

On behalf of joint sponsors Eastman Chemical Company and Solutia Inc., PCA Services, Inc. is pleased to submit to the Agency dossiers and a test plan for the Alkyl Nitriles Category. This submission is being made under the EPA Chemical RTK HPV Challenge Program for public posting and review.

The category consists of the following members:

Propionitrile (CAS No. 107-12-0)
Butyronitrile (CAS No. 109-74-0)
Isobutyronitrile (CAS No. 78-82-0)

Please note that Solutia Inc. originally notified the EPA of its intention to sponsor propionitrile separately, and that Eastman Chemical Company originally notified of its intention to sponsor butyronitrile and isobutyronitrile as individual chemicals. Subsequently both companies jointly determined that these three chemicals were best reviewed together as a category, taking advantage of the structure activity relationships of these close analogs. See letter of November 17, 2003 from Dr. James Deyo, Senior Associate for Applied Toxicology of Eastman Chemical Company (attached), and the letter of February 14, 2003 of Dr. Frederick Johannsen, HPV Coordinator of Solutia Inc. (at <http://www.epa.gov/chemrtk/c14258.htm>).

If there are any questions regarding the management of this chemical and concerning the test plan submission, please contact Dr. Rod Gerwe at (919) 382-8787 or r.gerwe2@verizon.net.

Yours truly,

Rod Gerwe

Rod Gerwe, Ph.D.
President, PCA Services, Inc. (contractor)

Cc Don A. Lederer, Solutia Inc.
James A. Deyo, Eastman Chemical Company

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